

# **Brentwood School**

# **Special Educational Needs and Disability Policy**

Policy Owner:	Deputy Head Pastoral and DSL Prep School Deputy Head Pastoral and DSL Senior School			
Relevant to:	Whole School (3-18)			
Relevant Legislation/Guidance:	Independent School Standards Regulations (2014) Special Educational Needs and Disability Code of Practice: 0 to 25 years 2015 (DfE and DoH) Early years: guide to the 0 to 25 SEND code of practice Equality Act, 2010 JCQ Access Arrangements and Reasonable Adjustments 2023/24			
Last reviewed by:	SLT 23rd May 2024			
Last approved by and date:	Education Committee 7th June 2024			
Last Updated:	May 2024			
Next review due:	Feb 2027			
Current version published:	10th June 2024			
Circulation:	All staff	Governors	Website	
Related & supporting documents:	Accessibility Plan	Administration of Medicines Protocol	Admissions Policy	
	Anti-bullying Policy	Behaviour Policy	Curriculum Policy	
	Data Protection & Privacy Notice for Pupils, parents, guardians and alumni	Equal Opportunities Policy	Progression Policy	
	Safeguarding Policy	Complaints Procedure		

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# SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND) POLICY

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# Introduction

This is the Special Educational Needs and Disabilities Policy of Brentwood School (School).

The aims and objectives of this policy are as follows:

- To facilitate early identification, assessment, provision, recording and monitoring for those with special educational needs and disabilities;
- To set high expectations for pupils with special educational needs and disabilities;
- To promote the inclusion of pupils with special educational needs and disabilities within the full curriculum;
- To support and collaborate with parents/carers of pupils with special educational needs and disabilities;
- To support and collaborate with school staff in regards to supporting pupils with special educational needs and disabilities
- To take account of pupils' views in order to increase self-esteem and promote their development as independent learners;
- To maintain an "open door" approach so that pupils can consult about their learning Brentwood School, Ingrave Road, Brentwood Essex, CM15 8AS www.brentwoodschool.co.uk

difficulties directly;

- To take account of advice from external agencies;
- To ensure that appropriate exam access arrangements are made in cooperation with the Examinations Officer;
- To promote on-going professional development on special educational needs for academic and pastoral staff;
- To ensure that discipline and other procedures (e.g. school trips) take account of pupils' learning difficulties and disabilities.

The School is committed to a policy of inclusion, equal opportunity and the policy has been prepared to meet the School's responsibilities under the Equality Act 2010 the Children and Families Act 2014, the Education (Independent School Standards) Regulations 2014, *Boarding Schools: national minimum standards* (Department for Education (DfE), April 2015, *Statutory framework for the Early Years Foundation Stage* (DfE, March 2017); the Education and Skills Act and the Data Protection Act 2018 and General Data Protection Regulation (GDPR). This policy also has regard to the Special Educational Needs and Disability Code of Practice: 0 to 25 years 2015 (SEND Code, DfE and Department for Health, 2015).

All pupils have a right to be able to access and gain fully from the curriculum. In certain cases, pupils may need a greater degree of adaptation and support to realise their potential. The individual needs of all pupils cover a wide spectrum; disabilities and specific learning difficulties exist across the ability range. The School sees the provision for special educational needs and disabilities as a whole School responsibility, working in conjunction with the Learning Support Departments, where the level of support offered by departments will try to reflect the diverse needs of the pupils identified as having a special educational need and/or disability.

The Accessibility Plan is available on the school website. Where a pupil has a Statement/Education and Health Care Plan (EHCP) the school will provide, and implement effectively, an education which fulfils its requirements. Details surrounding support of an EHCP application can be found later on in Section 11 of this document.

# Section 1 - Special Educational Needs, Learning Difficulties and/or Disabilities

## 1.1 Definitions of pupils with Special Educational Needs, Learning Difficulties and/or Disabilities

A child has special educational needs if they have a learning difficulty or disability which calls for special educational provision to be made for them. The SEND Code, defines a learning difficulty or disability if they:

- have a significantly greater difficulty in learning than the majority of others of the same age **or**
- have a disability which either prevents or hinders them from making use of educational facilities of a kind generally provided for others of the same age in mainstream schools or

mainstream post 16 institutions;

• are under five and fall within the definition in the bullet points above or are likely to do so do when of compulsory school age if special educational provision is not made for the child.

A pupil is not considered to have a 'learning difficulty' for the sole reason that the language in which they will be taught is different from the language spoken at home (Section 20 - Children and Families Act 2014). Pupils who have EAL requirements are provided with appropriate support from the EAL department in the Senior School and the EAL Coordinator in the Prep School. Please see the *Admissions Policy* and *Curriculum Policy* for information regarding our identification and assessment of, and support for, pupils who have English as an Additional Language.

A pupil who may be struggling in a specific subject area will not necessarily require learning support or be identified as having a 'learning difficulty'. There are naturally occurring differences between pupils' speed of learning and problem-solving skills. Individual subject areas provide support for pupils who need particular help with an area of the curriculum.

The expression 'learning difficulty' is an umbrella term that covers a variety of different conditions. These conditions may include dyslexia, dyspraxia, attention deficit disorders, autistic spectrum disorder, semantic processing difficulties and learning problems resulting from social, emotional or mental health difficulties. The term may also include those with sensory or physical problems such as hearing or eyesight loss.

Learning difficulties such as these occur across the full spectrum of academic ability.

Not all pupils who have a special educational need are disabled. Not all disabled pupils have a special educational need.

## 1.2 Disability and discrimination

<u>A pupil is disabled if they have '...a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities' (as defined by the Equality Act 2010). Conditions which may amount to disability include:</u>

- severe disfigurements, scarring conditions and birthmarks (but not including tattoos or piercings)
- progressive conditions which will result in a substantial long-term adverse effect on day to day activity
- a controlled impairment, i.e. a person with a prosthesis, or a person with drug controlled epilepsy or diabetes
- a history of impairment, for example a person who used to be disabled and has recovered, or a person with a previous mental illness.

Discrimination arising from disability occurs when a disabled person is treated unfavourably because of something connected with their disability and the treatment cannot be shown to be a proportionate means of achieving a legitimate aim.

The School will not knowingly discriminate against a disabled person:

- in the arrangements for determining admission;
- in the terms on which a place at the School is offered;
- by refusing or deliberately omitting to accept an application for admission;
- in the provision of education and associated services;
- in the way the School affords access to any benefit, service or facility offered or provided by the School;
- by excluding a person on the grounds of his or her disability;
- by harassing a person with a disability;
- by victimising a person with a disability; or
- by failing to take reasonable steps to ensure that disabled persons are not placed at a substantial disadvantage in comparison with non-disabled persons.

#### **1.3 Reasonable adjustments for pupils**

When providing educational services to a pupil, the School is legally required to make reasonable adjustments in order to cater for a pupil's disability.

The School shall inform the pupil and parents of the reasonable adjustments that the School is able to make for that pupil, which may typically include:

- making arrangements for a child with restricted mobility to attend an admissions interview in an accessible ground floor room;
- allowing extra time for a dyslexic child to complete an entrance exam;
- providing examination papers in larger print for a pupil with a visual impairment;
- rearranging the timetable to allow a pupil with restricted mobility to attend a class in an accessible ground floor room; or
- arranging a variety of accessible sports activities.

The Equality Act 2010 requires all schools to provide auxiliary aids and services for disabled pupils as part of the duty to make "reasonable adjustments". The School will anticipate 'reasonable adjustment' requirements and will carefully consider any proposals; the School will not unreasonably refuse any requests for such aids and services to be provided.

#### **1.4 Mental Health**

The School provides a caring environment where mental wellbeing is of the highest importance. All members of teaching staff will refer any potential mental health concerns to the relevant pastoral team. The Heads of Learning Support (SENDCos) are members of their respective pastoral teams. The pastoral team will act upon advice from a medical consultant or therapist to support the pupil in school responding appropriately to the needs of pupils with social, emotional and/or mental health difficulties. Parents are asked to keep the school closely informed on the progress of a child with mental health issues. Where appropriate, and agreed through communication with the pastoral team and home, pupils may be referred to the School Counsellor for further support. The Learning Support Departments operate an 'open door' policy to provide a safe, secure environment

for those pupils experiencing high anxiety or emotional difficulties.

#### **1.5 Medical Conditions**

The School endeavours to give every support possible to pupils with serious, ongoing medical conditions and keeps its facilities and provision under review. All reasonable steps are taken to prevent these pupils from being placed at a disadvantage. Regular planning and review meetings are scheduled with parents, the pupil, the pastoral team, the School Medical Team and Learning Support Departments.

# **Section 2 - Admissions**

#### 2.1 Admissions procedure

The School is open to applications from any prospective pupil with a disability or special educational need, and treats every application from a disabled child in a fair, open-minded way.

Every application is considered on its merits within the School's criteria for selection on grounds of the child's ability and aptitude. Applications are considered on the basis that all reasonable adjustments have been made by the School in order to cater for the child's disability.

The Brentwood School admission procedure records any known particular need or disability of the pupil on entry.

The Learning Support Department organises and conducts an examination session where reasonable adjustments are made to ensure that disabled pupils can perform to their best. In some cases this may involve extra-time, the use of a laptop or equivalent.

Parents are encouraged to speak to the Learning Support Department prior to their child's entry to the School concerning any disability or special educational need, regardless of the point of entry.

The Heads of Learning Support (SENDCos) will attend meetings to discuss the entry of pupils with disabilities or special educational needs, will liaise with the primary school SENDCo and may visit the primary school.

#### 2.2 Information Sharing at Admissions

A copy of any report or recommendations made in relation to the child's disability or special educational need at his/her previous school, elsewhere or through an external assessor must be provided to the School by the Parents. Confidential information will only be communicated and shared on a 'need to know' basis and kept on file should the pupil be successful in gaining entry to the School.

Those pupils who have a recognised specific learning difficulties or special educational needs are placed directly on the Special Educational Needs and Disabilities Register and, where appropriate, an Edukey Learning Support Plan is written via our Online Provision Mapping platform 'Edukey' and

distributed.

If, following the offer of the place, it is discovered that the School has not received full disclosure of information relating to the child's disability and the School is not able to provide adequately or appropriately for the child's physical and educational needs or promote the child's well-being by making reasonable adjustments for those disabilities, then the School may withdraw the offer of a place, or ask the parents to withdraw a child who is already a pupil. See also section 14 below.

# Section 3 - Roles and Responsibilities

# 3.1 The Role of the Heads of Learning Support (SENDCos)

The overall responsibility for Special Education Needs and Disabilities is with the Governing Body.

The Heads of Learning Support, who are the Special Education Needs and Disabilities Coordinators (SENDCos), are the points of contact for Special Education Needs and Disabilities in the School. The SENDCo in the Prep School reports to the Deputy Head Academic in the Prep; the SENDCo in the Senior School reports to the Deputy Head Pastoral. The key responsibilities of the Heads of Learning Support (SENDCos) are as follows:

- Overseeing the day-to-day operation of this policy in compliance with the SEND Code;
- Liaising with and advising all members of the school community as appropriate;
- Managing the Learning Support Department;
- Working closely with the pastoral teams to ensure a cohesive provision for pupils with special educational needs or disabilities;
- Coordinating additional provision for pupils with special educational needs, including ensuring Edukey Learning Support Plans for all pupils with an identified need are implemented;
- Overseeing the records of pupils with special educational needs to ensure confidentiality;
- Consulting with pupils over the structure and nature of their support;
- Liaising with parents of pupils with special educational needs;
- Contributing to the training of staff on special educational needs and disabilities;
- Liaising with external agencies and professionals including psychologists, psychiatrists and hospitals;
- Maintaining understanding of best practice through liaison with SENDCos from similar schools and appropriate Continuing Professional Development;
- Maintaining communication across the Preparatory and Senior schools;
- Working with the appropriate staff to provide documentation and recommendations for suitable examination access arrangements;
- Collaboration with Heads of Departments, Heads of Year and other key staff;
- Weekly communication at staff briefing to share/highlight key pupil information with staff.

## 3.2 Assessment and Audit of Provision

The Heads of Learning Support (SENDCos) meets regularly with members of the Senior Leadership Teams to discuss department-related issues and the welfare and progress of pupils. For record-keeping and provision-tracking, a log is kept of all support by the department.

The Learning Support Department collects and analyses data about pupils with special educational needs and disabilities in respect of:

- Rewards, sanctions and incidents;
- Attendance;
- Participation in extracurricular activities;
- Assessments, reports and examinations;
- Value added.

# **Section 4 - Provision**

## 4.1 - Outline of Provision

The School is committed to early identification, assessment and assistance of learning difficulties and special educational needs, including those with social, emotional and mental health difficulties. All staff are involved in this process and the Learning Support Department is available for advice, materials and in-class support. The Department reflects the whole school policy of developing the individual pupil's learning skills, raising their attainment, ensuring expectations of all pupils are high and catering to any special need.

## 4.2 - The Stages of Provision

## Special educational provision is carried out at three levels:

- High Quality Teaching. The subject teacher has responsibility for the delivery of his/her subject and the progress of the pupil. The Learning Support Department works with the class teacher to create individualised classroom and/or homework strategies
- Targeted additional interventions, depending on the pupil's need
- Specialist additional and highly personalised interventions
- All teachers strive to provide high quality, differentiated teaching and are responsible for the progress and development of the pupils in their class.

# **Section 5- Referral Process**

## 5.1 - Outline of the referral process

When a referral is made to the Learning Support Department, data is collected and an initial assessment of the pupil made. A referral can be made by any member of staff, a parent or the pupil themselves, however views will be sought from all parties before an assessment takes place. The parents are contacted and kept informed at each stage of the referral process. Reasons for a referral might include, but are not limited to: a pupil appearing to have difficulties or challenges in lesson tasks or with homework assignments, in particular subjects or in a number of subjects; challenges with organisation, written communication, processing, speed of reading; an uneven score profile in computer-based diagnostic testing.

The outcome of each referral is communicated to all relevant staff. See section 4.4 for further details on Edukey Learning Support Plans.

## 5.2 - Summary of process

- 1. Assess a clear analysis of the pupil's needs;
- 2. Plan parents are notified and agreement reached on the adjustments, interventions and support as well as the impact on progress, outcomes sought and date for review;
- Do the class teachers will remain responsible for working with the child on a daily basis, supported by the Heads of Learning Support (SENDCos). Any agreed additional provision will be put in place;
- 4. Review evaluate the impact and quality of the support and interventions.

## 5.3 - Assess

While the School has internal assessments that can be used to identify areas of specific need, we cannot diagnose dyslexia or other specific conditions within the School setting. A formal assessment can be arranged either by the parents or by the School, at the parents' expense.

In line with JCQ's Access Arrangement and Reasonable Adjustments regulations (section 7.3), the assessor can be employed or contracted by the School; or employed by the Local Authority or NHS; or may be an external assessor who has made prior contact with the Learning Support department, has established a working relationship with the Learning Support department and is approved by the Deputy Head Academic (on behalf of the Headmaster in his role as Head of Centre for public examinations). The Learning Support department can provide a list of external assessor's qualifications is obtained by, and must be provided to, the Learning Support department prior to the assessor undertaking any assessment of a pupil, and is held on file for inspection purposes.

A privately commissioned assessment, where the external assessor has not made prior contact with the Learning Support department, has not established a working relationship with the Learning Support department and has not been approved by the Deputy Head Academic, cannot be used for awarding access arrangements or making reasonable adjustments. As a privately commissioned assessment cannot be used to award access arrangements, the Head of Learning Support or Deputy Head Academic will provide a written rationale supporting their decision to the parent. However the Head of Learning Support will always carefully consider any privately commissioned assessment to see whether the process of gathering a picture of need, demonstrating normal way of working and ultimately assessing the pupil themselves should be instigated.

## 5.4 - Plan

The pupil's progress and needs will be monitored and, if necessary, the School will recommend a formal assessment if the learning support does not appear to be meeting the pupil's needs or

where it is required for the purposes of applying for exam access arrangements. See section 10 for Examinations Access Arrangements.

When a form of assessment has identified that a pupil has a special educational need, a planning meeting is held and chaired by a member of the Learning Support Department. The parents, pupil, class teacher, form tutor or Head of Year and any relevant external professions are invited to attend or provide a report so that the meeting is a thorough, collaborative, pupil centred approach. The purpose of this meeting is to collectively decide on what adjustments need to be made within the classroom and what, if any, additional provision needs to be made.

For pupils requiring extra support in addition to high quality teaching, the Learning Support Department offers the following:

## Prep School:

• In-class support.

In EYFS and KS1 every class has the support of a teaching assistant. In KS2, teaching assistants support is available in maths and English in all year groups. Support is also provided for specific children in other curriculum areas.

• Literacy development.

Individual and small group support is provided through programmes such as The Five Minute Box and Nessy, an online, multi-sensory intervention. Small group interventions for reading, spelling and writing run in years 1-6. In year 6, targeted literacy support is provided in place of one modern foreign language in preparation for transition to senior school.

- Numeracy Support in small groups.
- Speech and language development using the Speech and Language Link assessments and intervention materials. These are delivered 1:1 or in small groups.
- Handwriting development in KS2 using the Speed Up programme which provides a multi-sensory approach to develop legibility, speed and fluency.
- Motor skills development using the Hemispheres Think Write Handwriting Programme and Smart Moves
- Social skills development
- In KS1, Time To Talk is delivered in small groups to build understanding of and strategies for the different situations children meet in and out of school. Lunchtime club provides 'Safe Space' and a place for the development of social skills. A school counsellor is available once a week, providing support for children with a range of difficulties.
- Touch typing is taught through online programmes that run alongside the literacy interventions.
- Access to assistive technology

## Senior school:

- Study and revision skills classes
- Memory and organisational skills support and resources
- Literacy Support
- Numeracy Support

- 'Open Door' access to a Learning Support teacher where possible throughout the school day
- In-class support when required by the class teacher for a specific pupil
- Whole year screening for Literacy weaknesses in Years 9 and Lower 6th
- Some specialist subject-specific one to one/small group support
- Handwriting support resources and advice
- Support with social, emotional strategies working closely with the pastoral team and safeguarding leads
- Access to some assistive technology

As a result of the planning meeting, personalised outcomes and support for the pupil are agreed and a member of staff transfers these onto the Edukey Learning Support Plan.

## Registers

The Learning Support Department is responsible for keeping the Learning Support Register and Edukey Learning Support Plans up to date. The information is available centrally and securely for all teaching staff. All staff are required to be fully aware of the needs of each individual pupil and the strategies as outlined in the Edukey Learning Support Plan of pupils they teach or who are otherwise in their care.

## Edukey Learning Support Plans

For some pupils an Edukey learning Plan is drawn up by the Learning Support Department which states their needs as identified during the assessment and planning stages. Pupils and parents are consulted fully throughout the process. This document provides: an overview of the pupil's difficulties; agreed outcomes; inclusion of pupil-voice outlining their interests and areas of strength; recommendations for high quality teaching and record of any additional support being provided to the pupil; and clear dates for review. Relevant staff are notified when a new Edukey Learning Support Plan is created. Staff are expected to consult and act upon the Edukey Learning Support Plan. Reviews of the plans are held and any amendments circulated.

## 5.5 - Do

Teachers must ensure that pupils with Special Educational Needs and Disabilities have appropriate goals and interventions and that lessons are planned with regard to any special educational needs. They are supported in this by their Head of Department, Heads of Year and the Learning Support team. Concerns about individual pupils' difficulties are communicated with the Heads of Learning Support (SENDCos) as early as possible. The Form Tutor acts as the first point of contact for their tutees, passing relevant information to Learning Support. Heads of Department are responsible for the quality of teaching and learning in their subject and also to have an overview of the differentiation taking place to meet the individual needs of pupils and support those with long term special educational needs and disability.

## 5.6 - Review

The progress of pupils on the SEND register is regularly reviewed by the School, in collaboration

with the Learning Support departments, to evaluate the impact of adaptations on their progress and to assess whether further changes need to be made. Amendments can be made to an Edukey Learning Support Plan at other points in the year if new information arises that results in changes to pupil support. Once a plan has been reviewed, the cycle of 'assess, plan, do, review' begins once more, to ensure that support for the pupil is as effective as possible.

# Section 6 - Partnership with Parents

The School regards the partnership with parents of paramount importance in the education of the pupils and even more so when there are special educational needs.

Parents receive copies of Edukey Learning Support Plans and information on support sessions. The Department encourages parents to make appointments to discuss any provision, Learning Support Plans or concerns. The Heads of Learning Support will undertake or be part of all necessary discussions with parents concerning referrals to Educational Psychologists or other specialists and external agencies.

It is the responsibility of parents to:

- Recognise and fulfil their responsibilities as parents and play an active and valued role in their children's education;
- Have knowledge of their child's entitlement within the SEND framework;
- Have input into the decision-making process about how their child is educated;
- Access information, advice and support during assessment and any related decision making processes about SEND provision;
- Follow the Edukey Learning Support Plan advice.

It is the responsibility of pupils to:

- Be actively involved in their own learning;
- Engage fully in any additional support agreed upon
- Follow the Edukey Learning Support Plan advice.

# Section 7 - Relationships with outside agencies

The School has links with external professionals who work with the School on a regular basis. This includes medical consultants, occupational therapists, speech and language therapists, physiotherapists and optometrists. The Learning Support Department works together with the School Medical Team in providing support for pupils with medical needs.

For pupils with an EHCP, we work closely with the local authority and other involved external agencies to meet the needs of the pupil involved.

# Section 8 - Access to the curriculum

Some pupils with Specific Learning difficulties may, in consultation with parents and teachers, have their learning programme adjusted in order to ensure that they gain maximum benefit from the curriculum offered.

# Section 9 - English as an Additional Language

Pupils who have EAL requirements are provided with appropriate support from the EAL department in the Senior School and the EAL Coordinator in the Prep School.

Please see the *Admissions Policy* and *Curriculum Policy* for information regarding our identification and assessment of, and support for, pupils who have English as an Additional Language.

# Section 10 - Examinations Access Arrangements

Pupils who meet the criteria for access arrangements as stated by the JCQ and other qualification bodies are eligible for access arrangements to complete internal examinations and public examinations.

Parents are asked to liaise with the Learning Support department with respect to this.

# Section 11- Education Health and Care plans (EHCP)

For a very few pupils, help given at the SEND Support stage may be insufficient in enabling the pupil to make adequate progress.

Parents/guardians and the school have the right under Section 36 of the Children and Families Act 2014 to ask the local authority (LA) to make an assessment with a view to drawing up an EHCP. The School will always consult with parents/guardians before exercising this right. If the LA refuses to make an assessment, the parents/guardians (but not the School) have the right to appeal to the First-tier Tribunal (Health Education and Social Care).

Where a prospective pupil has an EHCP, the School will consult with parents and, where appropriate, the LA to ensure that the provision specified on the EHCP can be met and delivered by the school. The School will cooperate with the LA to ensure relevant reviews of the EHCP are carried out as required.

Any additional services that are needed to meet the requirements of the EHCP will be charged to the LA if the authority is responsible for the fees and our school is named in Section I of the EHCP. In all other circumstances the school will agree the arrangements with the parent(s) with regard to the provisions of the Equality Act 2010, where applicable.

# Section 12 - Additional Welfare Needs

The School recognises that pupils with disabilities or special educational needs or learning difficulties may be at risk of being bullied. The School's Anti-Bullying Policy makes it clear that bullying behaviour of any kind is not acceptable and will be taken very seriously.

The School will tackle inappropriate attitudes and practices through staff leading by example, through the Wellbeing (PSHE), relationships education / relationships and sex education programmes, through the supportive School culture and through the School's policies.

If parents are concerned about their child's welfare they should approach the pupil's form teacher in the first instance or any senior member of staff to discuss their concerns.

Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that these can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further explanation;
- pupils with a special educational need or disability or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

Any safeguarding concerns will be dealt with in accordance with the procedures set out in the School's safeguarding policy and procedures.

# Section 13 - Staff Training

The school places great value on staff being kept fully informed of recent and applicable teaching practice for disabilities, specific learning difficulties and emotional behavioural difficulties. The School ensures that on induction and at the beginning of each academic year, staff receive training by the Heads of the Learning Support Department on SEND and on the SEND Policy so that they have the necessary knowledge and skills to carry out their roles.

# Section 14 - Alternative Arrangements

## 14.1 Withdrawal

The School reserves the right, following consultation with parent(s)/guardian(s), to withdraw a child from the School if, in our opinion, after making all reasonable adjustments and exhausting appropriate strategies:

- The pupil is in need of a formal assessment, additional specialist teaching, learning support or medication to which you do not consent; and/or
- Parents have withheld information from the School which, had the information been provided, would have made a significant different to the school's management of the pupil's learning difficulties; and/or
- The pupil's learning difficulties require a level of support or medication which, in the professional judgement of the Headmaster/Heads of Learning Support (SENDCos)/SAN staff, the school is unable to provide, manage or arrange;
- The pupil has SEND that make it unlikely they will be able to benefit sufficiently from the mainstream education and facilities the School provides.

## 14.2 Alternative Placement

In any of these circumstances, the School will do what is reasonable to help parent(s)/guardian(s), find an alternative placement, which will provide the pupil with the necessary level of teaching and support.

## Section 15 - Risk assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

The Designated Safeguarding Leads, working with the SENDCos in the Senior School and Prep School, are responsible for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this policy.

## Section 16 - Record keeping

All records created and retained in accordance with this policy including personal data are managed in accordance with the Data Protection Act 2018 and details are available in the School's Data Protection and Privacy Notice.

## Section 17 - Appeals and complaints

If a student or parent disagrees with any aspect of how this policy has been implemented (including, but not limited to, appealing decisions, referrals, support, or examination access arrangements), they may pursue this matter further via the School Complaints Procedure available on the School website.